

All Cases: Debtor(s) John Frazier Case No. 15-23827 Chapter 7

All Cases: Moving Creditor WELLS FARGO BANK, N.A.

Date Case Filed 7/13/15

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: _____ No-Asset Report filed on _____
☒ No-Asset Report not Filed, Date of Creditor's Meeting: 12/2/2015

1. Collateral
 - a. Home ☒
 - b. Car _____ Year, Make and Model _____
 - c. Other _____
2. Balance Owed as of 12/29/2015: \$378,723.11
Total of all other Liens against Collateral: _____
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$250,000.00, per Debtor's Schedules.
5. Default
 - a. ☒ Total Default as of 12/29/2015
Number of months 25 Amount \$65,944.64
 - b. _____ Post-Petition Default
 - i. _____ On direct payments to the moving creditor
Number of months _____ Amount _____
 - ii. _____ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount _____
6. Other Allegations
 - a. _____ Lack of Adequate Protection § 362(d)(1)
 - i. _____ No insurance
 - ii. _____ Taxes unpaid Amount _____
 - iii. _____ Rapidly depreciating asset
 - iv. _____ Other (describe) _____
 - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. _____ Other "Cause" § 362(d)(1)
 - i. _____ Bad faith (describe) _____
 - ii. _____ Multiple filings
 - iii. _____ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☒ Reaffirm
 - ii. _____ Redeem
 - iii. _____ Surrender
 - iv. _____ No Statement of Intention Filed

Date: 1/5/2016

/s/ Joel P. Fonferko
Counsel for Movant